

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SONTERRA CAPITAL MASTER FUND, LTD.,
HAYMAN CAPITAL MANAGEMENT, L.P., AND
CALIFORNIA STATE TEACHERS' RETIREMENT
SYSTEM, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

DOCKET NO. 15-cv-05844-GBD

UBS AG, UBS SECURITIES JAPAN CO. LTD.,
MIZUHO BANK, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST
AND BANKING CO., LTD., THE NORINCHUKIN
BANK, MITSUBISHI UFJ TRUST AND BANKING
CORPORATION, SUMITOMO MITSUI BANKING
CORPORATION, RESONA BANK, LTD., J.P.
MORGAN CHASE & CO., JPMORGAN CHASE
BANK, NATIONAL ASSOCIATION, J.P. MORGAN
SECURITIES PLC, MIZUHO CORPORATE BANK,
LTD., DEUTSCHE BANK AG, DB GROUP
SERVICES UK LIMITED, MIZUHO TRUST AND
BANKING CO., LTD., THE SHOKO CHUKIN
BANK, LTD., SHINKIN CENTRAL BANK, THE
BANK OF YOKOHAMA, LTD., SOCIÉTÉ
GÉNÉRALE SA, THE ROYAL BANK OF
SCOTLAND GROUP PLC, THE ROYAL BANK OF
SCOTLAND PLC, RBS SECURITIES JAPAN
LIMITED, RBS SECURITIES INC., BARCLAYS
BANK PLC, BARCLAYS PLC, BARCLAYS
CAPITAL INC., CITIBANK, NA, CITIGROUP, INC.,
CITIBANK, JAPAN LTD., CITIGROUP GLOBAL
MARKETS JAPAN, INC., COÖPERATIEVE
CENTRALE RAIFFEISEN-BOERENLEENBANK
B.A., HSBC HOLDINGS PLC, HSBC BANK PLC,
LLOYDS BANKING GROUP PLC, LLOYDS BANK
PLC, ICAP PLC, ICAP EUROPE LIMITED, R.P.
MARTIN HOLDINGS LIMITED, MARTIN
BROKERS (UK) LTD., TULLETT PREBON PLC,
BANK OF AMERICA CORPORATION, BANK OF
AMERICA, N.A., MERRILL LYNCH
INTERNATIONAL, AND JOHN DOES NOS. 1-50,

Defendants.

**DECLARATION OF BRENT L. BARTON IN SUPPORT OF
THE MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION OF
J.P. MORGAN SECURITIES PLC**

I, Brent L. Barton, hereby declare:

1. I am Managing Director of JPMorgan Chase Bank, N.A. ("JPMCBNA").

I submit this declaration in further support of the motions to dismiss for lack of personal jurisdiction filed by J.P. Morgan Securities plc (p/k/a J.P. Morgan Securities, Ltd.) ("JPMS plc").

I have personal knowledge of the facts set forth herein based on my work at JPMCBNA.

2. Between January 1, 2006 and June 30, 2011 (the "Relevant Period"),

JPMS plc did not submit rates to the British Bankers' Association in the United Kingdom for use in the calculation of the Yen London Interbank Offered Rate ("Yen LIBOR") nor did it submit rates to the Japanese Bankers Association for use on the calculation of the Euroyen Tokyo Interbank Offered Rate ("Euoryen TIBOR").

3. During the Relevant Period, JPMorgan Chase Bank, N.A., London Branch

submitted rates to the British Bankers' Association for use in the calculation of Yen LIBOR.

The individuals that made these submissions were located in London, United Kingdom and made the submissions from London, United Kingdom.

4. During the Relevant Period JPMorgan Chase Bank, N.A., Tokyo Branch

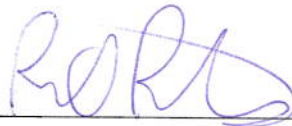
submitted rates to the Japanese Bankers Association for use in the calculation of Euroyen

TIBOR. The individuals that made these submissions were located in Tokyo, Japan and made the submissions from Tokyo, Japan.

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Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York
February 1, 2016



Brent L. Barton
Managing Director
JPMorgan Chase Bank, N.A.